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October 16, 1998

Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: In the Matter of Amendment of Section 73.202(b),
Table of Allotments, FM Broadcast Stations.
(Alva, Mooreland, Tishomingo, Tuttle, and
Woodward, Oklahoma)
MM Docket No. 98-155
RM-9082
RM-9133

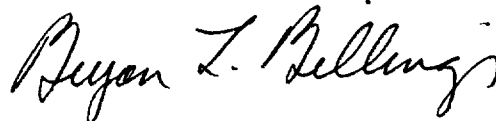
Dear Secretary:

Please find enclosed an original and five copies of a Response To Order To Show Cause And Comments Of Classic Communications, Inc. in regard to the above referenced cause. Please file the original and retain four of the copies for your use. Please acknowledge receipt and filing of this document by file stamping the remaining copy and returning the file-stamped copy to me in the enclosed self-addressed stamped envelope.

If you have any questions in regard to this matter, please do not hesitate to contact me. Thank you very much.

Very truly yours,

BILLINGS & BILLINGS



Bryan L. Billings

BLB:lf

Enclosures

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Federal Communications Commission

DA 98-1682

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 98-155
Table of Allotments,)	RM-9082
FM Broadcast Stations.)	RM-9133
(Alva, Mooreland, Tishomingo, Tuttle,)	
and Woodward, Oklahoma))	

RESPONSE TO ORDER TO SHOW CAUSE
AND COMMENTS OF
CLASSIC COMMUNICATIONS, INC.

Classic Communications, Inc. hereby responds to the Notice Of Proposed Rule Making And Orders To Show Cause adopted herein on August 19, 1998 as follows:

RESPONSE TO ORDER TO SHOW CAUSE

1. In paragraph 11 of the Notice Of Proposed Rule Making And Orders To Show Cause Classic Communications, Inc. was requested to state which channel and class it intends to pursue since it applied for permission to operate on Channel 261 as a Class A station and indicated that it might file another application for an increase in power to 25KW in the future. Since the filing of said application, circumstances have changed so that Classic Communications, Inc. now desires to operate KWFX(FM) as a Class C1 station. Therefore, in response to said request, Classic Communications, Inc. hereby states that it intends to pursue operation of KWFX(FM) as a Class C1 station on Channel 261 as presently licensed.

2. Classic Communications, Inc. does not object to the adoption of Option I of the proposed amendment of the FM Table Of Allotments, Section 73-202(b) of the Commission's rules for the community listed below, to read as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u> <u>Proposed</u>
Alva, Oklahoma	259C1, 278C1, 289C2	260C1, 278C1, 289C2
Mooreland, Oklahoma	--	283C1
Tishomingo, Oklahoma	259C3	--
Tuttle, Oklahoma		259C3
Woodward, Oklahoma	240A, 261C1, 266C, 272A	240A, 266C, 272A, 292C1

and further does not object to the modification of the license of KWFX(FM), Woodward, Oklahoma, to specify operation on Channel 292C1 instead of Channel 261C1 as presently licensed, so long as Ralph Tyler and/or FM 92 Broadcasters, Inc. reimburses Classic Communications, Inc. for the reasonable and prudent expenses relating to the change in power and the change of channel should the FM Table Of Allotments be amended as set forth in Option I.

3. At the appropriate time, Classic Communications, Inc. will amend its pending application or make other applications to conform to the orders issued herein.

4. Classic Communications, Inc. objects to the proposed amendment of the FM Table Of Allotments, Section 73-202(b) of the Commission's rules, for the community listed below, to read as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u> <u>Proposed</u>
Alva, Oklahoma	259C1, 278C1, 289C2	260C1, 278C1, 289C2
Mooreland, Oklahoma	--	283C1
Tishomingo, Oklahoma	259C3	--
Tuttle, Oklahoma		259C3
Woodward, Oklahoma	240A, 261C1, 266C, 272A	228A, 240A, 266C, 272A

and to the modification of the license of Station KWFX(FM), Woodward, Oklahoma, to operate on Channel 228A instead of Channel 261C1 as presently allocated. Options I and II of the proposed amendment are identical in all respects except as to the channel of operation and power level of KWFX(FM). Therefore, if the FM Table Of Allotments is amended herein, it would appear that no party other than Classic Communications, Inc., the licensee of KWFX(FM), has a legitimate interest in which of the two options is selected. Under Option I, Classic Communications, Inc. can be authorized to broadcast at a higher power on Channel 292C1 than on Channel 228A, thereby increasing the area of service and the availability and choice to the public. If the FM Table Of Allotments is amended, it is in the best interest of the public for the license of KWFX(FM) to be amended to Channel 292C1 instead of to Channel 228A.

COMMENTS ON PROPOSED RULE MAKING

5. Classic Communications, Inc. hereby incorporates by reference all of the statements set forth under the Response To Order To Show Cause set forth above as comments on the Proposed Rule Making entered herein on August 19, 1998.

6. Contrary to the statement set forth in paragraph 2 of the Notice Of Proposed Rule Making And Orders To Show Cause, Station KWFX(FM) returned to the air on June 27, 1996 and has been

on the air ever since. Classic Communications, Inc. notified the Commission of the return of KWFX(FM) to the air on June 28, 1996.

Respectfully submitted,

CLASSIC COMMUNICATIONS, INC.

By: Sherre D. House
Sherre D. House, President
P.O. Box 1600
Woodward, OK 73802

STATE OF OKLAHOMA, }
COUNTY OF WOODWARD. } ss.

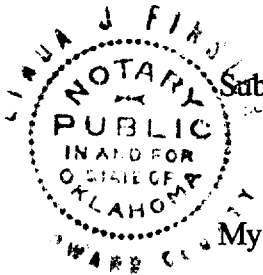
Sherre D. House, of lawful age, being first duly sworn on oath, deposes and states:

That she is the President of Classic Communications, Inc. above named and has read the above and foregoing instrument and knows the contents thereof, and that the matters and things therein stated are true and correct.

Sherre D. House
Sherre D. House

Subscribed and sworn to before me this 16th day of October, 1998.

Linda J. Finster
Notary Public



My commission expires: August 1, 1999.

CERTIFICATE OF SERVICE

I certify that on the 16th day of October, 1998, I served a copy of the foregoing by United States Mail, postage prepaid, upon the following persons at the addresses shown below:

Kathryn R. Schmeltzer and Kevin M. Walsh, Fisher Wayland Cooper Leader & Zaragoze, L.L.P., 2001, Pennsylvania Avenue, NW, Suite 400, Washington, D.C. 20006 (Counsel to FM 92);

Gary S. Smithwick, Smithwick & Belendiuk, P.C., 1990 M Street NW, Suite 510, Washington, D.C. 20036 (Counsel to Tyler);

Chisholm Trail Broadcasting Co., 316 East Willow, Enid, OK 73701.

Sherre D. House
Sherre D. House